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October 11, 2022

VIA ECF

The Honorable Cheryl L. Pollak
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, Room 1230
Brooklyn, New York 11201

Re: Marin, et al. v. Apple-Metro, Inc., at al., No. 12 Civ. 5274 (E.D.N.Y.)
Dove, et al. v. Apple-Metro, Inc., at al., No. 13 Civ. 1417 (E.D.N.Y.)

Dear Judge Pollak:

We represent Defendants in the above matters.¹ We write pursuant to Your Honor's individual rules to request an extension of the Court ordered deadline to complete discovery in the above matters. *See* October 26, 2021 Text Order (*Marin*, Civ. No. 12-cv-05274-ENV-CLP; *Dove*, Civ. No. 13-cv-01417-ENV-CLP). Plaintiffs agree to, and join in, this request.

Specifically, the parties seek a four (4) month extension of the current deadline of December 23, 2022, up to and including April 24, 2023, to complete discovery in the above matters. To date, the parties have conducted a significant amount of written discovery and engaged in a cooperative process to determine deponents. Due to the large number of anticipated depositions, the parties would have requested an extension in any event but have also agreed to pursue settlement discussion. The parties thus request this four (4) month extension in order to explore potential resolution of these matters prior to conducting and completing those depositions. Accordingly, the parties respectfully request that the Court extend the deadline for the parties to complete depositions up to and including April 24, 2023. The parties make this request in good faith and not for the purposes of delay.

Respectfully submitted,

/s/ *Jessica F. Pizzutelli*

Jessica F. Pizzutelli

cc: All Counsel of Record (Via ECF)

¹ Except individually named Defendant, Samal.